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October 19, 2023

**Via ECF**

The Honorable Arun Subramanian  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 15A  
New York, NY 10007

**Re: Go Global Retail, LLC v. Dream On Me, Inc.**  
**Case No. 1:23-cv-07987-AS**  
**GRSD File No. 31685-00003**

Dear Judge Subramanian:

This firm, along with Fox & Melofchik, LLC, represents Defendant, Dream On Me, Inc. ("DOM"). Plaintiff, Go Global Retail, LLC, filed a complaint on September 14, 2023. See ECF #5. The clerk of the court issued an Amended Summons on September 29, 2023. See ECF #11. On October 3, 2023, DOM was served with the complaint. See ECF # 12. The current deadline for DOM to answer or otherwise plead is on or before October 24, 2023.

Pursuant to Local Civil Rule 7.1(d), DOM respectfully requests additional time for counsel to review the pleadings and investigate the claims against DOM before filing a response to the complaint. Additionally, counsel anticipates filing a motion for pro hac vice admission of Judah Skof, Esq., of Greenbaum, Rowe, Smith & Davis, LLP, on or before the responsive pleading is due. Therefore, DOM respectfully requests that the deadline to answer or otherwise plead be extended 28 days to allow counsel adequate time to file the Motion in advance of a responsive pleading. With the Court's permission, along with the consent of our adversary, DOM shall file and serve an Answer, or otherwise plead, on or before November 21, 2023. This is DOM's first request for an extension of time.

Currently scheduled before Your Honor is an Initial Pretrial Conference on November 30, 2023, at 10:30 a.m., in Courtroom 15A. The extension will not affect any dates or deadlines scheduled.

We thank Your Honor for the Court's attention to this matter.

Respectfully submitted,

  
**GREENBAUM, ROWE, SMITH & DAVIS, LLP**

Jessica M. Carroll

Gary E. Fox, Esq.

**FOX & MELOFCHIK, LLC**

Co-counsel for Defendant, Dream On Me, Inc.

cc: All Counsel of Record (via ECF)

So Ordered:

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Arun Subramanian  
United States District Court